

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE STATE OF NEW JERSEY and THE
NEW JERSEY DEPARTMENT OF
CORRECTIONS,

Defendants.

21-15031(ZNQ)

**JOINT STIPULATION TO EXTEND
CERTAIN CONSENT DECREE
DEADLINES**

Plaintiff the United States of America and Defendants the State of New Jersey and the New Jersey Department of Corrections (together, the “Parties”), by and through their undersigned counsel, respectfully submit this Joint Stipulation to extend certain deadlines in the August 24, 2021 Settlement Agreement and Consent Decree (the “Consent Decree”) that governs reforms at Edna Mahan Correctional Facility for Women (“EMCF”).

1. Defendants State of New Jersey and New Jersey Department of Corrections (“Defendants”) continue to work to implement all of the Consent Decree provisions on a timely basis, in coordination with the Monitor and United States.

2. In consultation with the Monitor, Jane Parnell, and pursuant to Consent Decree Paragraph 17, which allows the Parties to request reasonable extensions of any timeframes in the Consent Decree, the Parties agree to extend the timeframes of Consent Decree Paragraphs 10, 11, and 92 as detailed below.

3. Consent Decree Paragraph 10 required (i) Defendants to revise all policies and procedures related to twelve enumerated subjects by May 24, 2022, and (ii) the Monitor to provide

feedback on all policies within 30 days. Due to the volume and complexity of the policies required by the Consent Decree and the time required for the Monitor to review and provide feedback on those revised policies, the Parties agree to extend the timeframe in Paragraph 10 for the Monitor's feedback for all policies until September 26.

4. Consent Decree Paragraph 11 required EMCF to adopt all revised policies and procedures covered by Paragraph 10 by August 24, 2022. Due to the extension of the timeframe in Paragraph 10, the Parties further agree to extend the timeframe for EMCF to adopt all relevant policies and procedures in Paragraph 11 by six months until February 24, 2023.

5. Consent Decree Paragraph 92 required EMCF to draft and/or revise any quality improvement policies and procedures by August 24, 2022. These policies will refer to and incorporate various provisions of the Paragraph 10 policies. Due to the extension of the timeframe in Paragraph 10, the Parties further agree to extend the timeframe for EMCF to draft and revise all quality improvement policies and procedures subject to Paragraph 92 by 12 months until August 24, 2023.

6. To the extent further extensions of these timeframes are ultimately required, the Parties will so stipulate.

For the UNITED STATES OF AMERICA:

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So Ordered this 23rd day
of August, 2022



Hon. Zahid N. Quraishi
United States District Judge